

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-10216JLT

CARLOS PINEDA and
ALEXANDRA PEREZ,
Plaintiffs,

v.

DANIEL KEELER, DENNIS
HARRIS, JOSPEH R. WATTS,
JOSEPH P. TOOMEY, WILLIAM
J. GALLAGHER, EDWARD
GATELY, JANINE BUSBY, and
the CITY OF BOSTON
Defendants

**DEFENDANT WATTS ASSENTED-TO MOTION
TO ENLARGE TIME TO FILE RESPONSIVE PLEADINGS
PURSUANT TO FED.R.CIV.P. 6(B).**

Pursuant to Fed. R. Civ. P. 6(b), the Defendant Joseph Watts respectfully moves this Honorable Court for an extension of time to file his responsive pleadings. As grounds for his motion, the Defendant states the following:

1. A prior extension was granted by this Court and established June 1, 2005 as the new deadline for filing responsive pleadings;
2. Undersigned counsel, however, requires additional time to investigate the Complaint and draft responsive pleadings;
3. The Plaintiffs have assented to the Defendant's request for more time to file responsive pleadings (Rule 7.1 certification included below);
4. Defendant requests a brief one-day extension until June 2, 2005, to file his response to Plaintiffs' Complaint; and,

5. Allowing this motion will not prejudice any party to the action and permitting the Defendant Watts an extension to file responsive pleadings to Plaintiffs' Complaint will further the interests of justice.

WHEREFORE, Defendant Watts respectfully requests that this Honorable Court allow their motion to extend time to file responsive pleadings, and set the date for filing responsive pleadings to on or before June 2, 2005.

Respectfully submitted,

DEFENDANT JOSEPH R. WATTS
Merita A. Hopkins
Corporation Counsel

By his attorney:

/s/ Helen G. Litsas

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7.1 Certification

Undersigned counsel certifies that on June 1, 2005, pursuant to LR, D. Mass. 7.1(a)(2), she spoke with Plaintiff's counsel who assented to the Defendants request for more time to file responsive pleadings.

6/105
Date: _____

/s/ Helen G. Litsas

Helen G. Litsas, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on this day, a copy of this document was served upon counsel of record via electronic filing.

6/1/05
Date: _____

/s/ Helen G. Litsas

Helen G. Litsas, Esq.